

Applicant : James J. Estrada and John P. Felleman
Serial No. : 09/922,345
Filed : August 3, 2001
Page : 8 of 11

Attorney's Docket No.: 07844-213001 / P191

REMARKS

Claims 1-21 are pending in this application. Claims 1-21 were rejected. Claims 1, 3, 7, and 18-21 have been amended. The specification has been amended to account for typographical errors. No new matter has been added. Applicant respectfully traverses the rejections and requests reconsideration in view of the amendments and following remarks.

Claim 7

Claim 7 was rejected under 35 U.S.C. 102(e) as being anticipated by Klassen (U.S. Patent No. 6,031,544). Applicant respectfully traverses the rejection.

Claim 7, as amended, recites a method of specifying output device independent trapping color values in a graphical processing system. The method includes "generating a device independent trap color value."

Klassen discloses a color printing system. The color printing system provides trapping to correct misregistration between printer output colors. Klassen's color printing system converts printer output colors into CIELAB space in order to determine whether the misregistration between printer output colors will be visible. If the misregistration is likely to be visible, the color printing system chooses the color and the location for the trap (FIG. 4, column 11, lines 30-39).

However, nothing in Klassen indicates that the color printing system chooses a device independent color for the trap. In fact, Klassen expressly states in column 14, lines 16-18, that "a predetermined set of trapping colors is maintained as a palette, with selection throughout the gamut of a device." Accordingly, Klassen does not teach or suggest "generating a device independent trap color value," as recited in claim 7.

Furthermore, it would not be obvious to a person of ordinary skill in the art to modify Klassen to include the above discussed feature of generating a device independent trap color value. Such a modification would be in direct conflict with the goal of Klassen's color printing system, which is directed towards trapping in a device dependent space (column 9, lines 9-12), and, in fact, requires that a device be capable of converting device independent colors into the

Applicant : James J. Estrada and John P. Felleman
Serial No. : 09/922,345
Filed : August 3, 2001
Page : 9 of 11

Attorney's Docket No.: 07844-213001 / P191

output colors of the device (column 12, lines 53-60). For at least this reason, claim 7 and its dependent claims are allowable.

Claim 20

Claim 20 was rejected under 35 U.S.C. 102(e) as being anticipated by Klassen (U.S. Patent No. 6,031,544). Applicant respectfully traverses the rejection.

Claim 20, as amended, recites a program storage device readable by a computer system. The program storage device has a program of instructions, including instructions to "generate a device independent trap color value." As explained in reference to claim 7, nothing in Klassen teaches or suggests generating a device independent trap color value, as required by claim 20. For at least this reason, claim 20 is allowable.

Claim 1

Claim 1 was rejected under 35 U.S.C. 103(a) as being unpatentable over Klassen in view of Speck (U.S. Patent No. 6,654,145). Applicant respectfully traverses the rejection.

Claim 1, as amended, recites a method for specifying a device independent trap color in a color space for a color boundary. The method includes "generating a device independent trap color value." As explained in reference to claim 7, nothing in Klassen teaches or suggests generating a device independent trap color value, as required by claim 1. The Examiner does not find this feature in Speck, and Speck indeed does not cure the deficiencies of Klassen because nothing in Speck teaches or suggests generating a device independent trap color value. For at least this reason, claim 1 and its dependent claims are allowable.

Claim 19

Claim 19 was rejected under 35 U.S.C. 103(a) as being unpatentable over Klassen in view of Speck (U.S. Patent No. 6,654,145). Applicant respectfully traverses the rejection.

Claim 19, as amended, recites a program storage device readable by a computer system. The program storage device includes a program of instructions, including instructions to "generate a device independent trap color value." As explained in reference to claim 7, nothing in Klassen teaches or suggests generating a device independent trap color value, as required by

Applicant : James J. Estrada and John P. Felleman
Serial No. : 09/922,345
Filed : August 3, 2001
Page : 10 of 11

Attorney's Docket No.: 07844-213001 / P191

claim 19. The Examiner does not find this feature in Speck, and Speck indeed does not cure the deficiencies of Klassen because nothing in Speck teaches or suggests generating a device independent trap color value. For at least this reason, claim 19 is allowable.

Claim 18

Claim 18 was rejected under 35 U.S.C. 103(a) as being unpatentable over Klassen in view of Uchino. Applicant respectfully traverses the rejection.

Claim 18, as amended, recites a method for specifying a device independent trap color in a color space for a color boundary. The method includes "generating a device independent trap color value." As explained in reference to claim 7, nothing in Klassen teaches or suggests generating a device independent trap color value, as required by claim 18. The Examiner does not find this feature in Uchino, and Uchino indeed does not cure the deficiencies of Klassen because nothing in Uchino teaches or suggests generating a device independent trap color value. For at least this reason, claim 18 is allowable.

Claim 21

Claim 21 was rejected under 35 U.S.C. 103(a) as being unpatentable over Klassen in view of Uchino. Applicant respectfully traverses the rejection.

Claim 21, as amended, recites a program storage device readable by a computer system. The program storage device has a program of instructions, including instructions to "generate a device independent trap color value." As explained in reference to claim 7, nothing in Klassen teaches or suggests generating a device independent trap color value, as required by claim 21. The Examiner does not find this feature in Uchino, and Uchino indeed does not cure the deficiencies of Klassen because nothing in Uchino teaches or suggests generating a device independent trap color value. For at least this reason, claim 21 is allowable.

Applicant : James J. Estrada and John P. Felleman
Serial No. : 09/922,345
Filed : August 3, 2001
Page : 11 of 11

Attorney's Docket No.: 07844-213001 / P191

Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 5/9/2005



Mark D. Kirkland
Reg. No. 40,048

Fish & Richardson P.C.
500 Arguello Street, Suite 500
Redwood City, California 94063
Telephone: (650) 839-5070
Facsimile: (650) 839-5071

50263844.doc